

Appendix A
Shoshone-Bannock Tribal Report

Appendix A

Shoshone-Bannock Tribal Report

The Idaho National Engineering and Environmental Laboratory is included within the original aboriginal territories of the Shoshone-Bannock Tribes. A wide variety of natural and cultural resources and areas that directly reflect tribal cultural heritage and native landscape ecology are preserved there. These resources are of great importance to the Shoshone-Bannock Tribes in the maintenance of tribal spiritual and cultural values and activities, oral tradition and history, mental and economic well being, and overall quality of life. In an attempt to gain unbiased insight into the social and cultural impacts of Waste Area Group (WAG) 6 and 10 activities and contamination on these unique resources, Department of Energy Idaho Operations Office contracted directly with the Shoshone-Bannock Tribal Risk Assessment Committee, an organized group of tribal employees, tribal members, and tribal elders officially sanctioned by the Tribal Council to provide feedback on risk assessment matters. This group analyzed technical information provided by WAG 10, participated in field tours to the Idaho National Engineering and Environmental Laboratory site, and conducted follow-on interviews with tribal elders to produce the technical report presented herein.

WAG 10 recognizes that the greatest insights into tribal viewpoints and values will originate from direct tribal interaction and will be best communicated by tribal voices. In this spirit of openness and exchange, the report prepared by the Tribal Risk Assessment Committee is presented here, in whole and unedited, as an independent statement of tribal concerns. Importantly, however, this independent tribal viewpoint does not necessarily directly represent the views of WAG 10 or the Department of Energy Idaho Operations Office.

**Report of Shoshone-Bannock Tribes of the Fort Hall Indian Reservation
on Selected Tribal Observations and Concerns on Proposed Work Plan for
Waste Area Groups 6 and 10 Operable Unit 10-04 Comprehensive
Remedial Investigation/Feasibility Study and Related Ecological Risk
Assessment (ERA) Activities**

September 30, 2000

I. Introduction

This Report is submitted to the Department of Energy Waste Area Groups 6 and 10 Operable Unit 10-04 (WAG-10) of the Idaho National Engineering and Environmental Laboratory (INEEL), by the Shoshone-Bannock Tribes Risk Assessment Committee in accordance with purchase order DE-AP07-001D00503. This Report summarizes the observations and concerns of the Shoshone-Bannock Risk Assessment Committee (Tribal Risk Committee) of the Work Plan of the Remedial Investigation and Feasibility Study (Work Plan) for the WAG-10 based upon site visits at contaminated release sites, review of written documents and studies obtained from WAG-10, and presentations by WAG-10 staff to the Tribal Risk Committee.

II. The Shoshone-Bannock Tribes Interests in WAG-10

The Shoshone-Bannock Tribes (Tribes), collectively, comprise a single federally recognized sovereign government organized under a Constitution and By-Laws adopted pursuant to the Indian Reorganization Act of 1934, as amended, 48 Stat. 984. The Shoshone-Bannock peoples comprise several related bands whose aboriginal territory includes the states of Idaho, Oregon, Wyoming, Utah, Nevada, Colorado, and parts of Montana and California. The Tribes are successors-in-interest to the Tribal signatories of numerous federal treaties and agreements, including the Fort Bridger Treaty, concluded on July 3, 1868 and ratified by the Senate on February 24, 1869, 15 Stat. 673. The Tribes are responsible for protecting both the individual and communal interests of the descendants of the Shoshone and Bannock peoples.

In 1867, President Andrew Johnson by Executive Order designated the Fort Hall Indian Reservation for the various bands of Shoshone and Bannock bands who occupied the area for time immemorial. Article 4 of the Fort Bridger Treaty reserved the Fort Hall Indian Reservation as a "permanent home" for the signatory Tribes. The Reservation is located approximately 40 miles southeast of the INEEL, and this is very much within its region of influence.

For thousands of years, the Tribes have relied upon fish, animals and plants for sources of food and medicines, and have religiously honored these creations that give and sustain the life of the Shoshone and Bannock. These land-based resources are still used by Tribal members. Article 4 of the 1868 Treaty reserved Tribal members hunting, fishing and gathering rights on surrounding federal lands. The aboriginal rights of the Tribes extend to land off-Reservation including the present day INEEL site, land both adjacent to and near the INEEL, and lands impacted by the INEEL.

III. The Shoshone and Bannock Worldviews

As with many other indigenous peoples of the world, the living worldviews of the Shoshone and Bannock peoples have worked well for them for thousands of years. The concept of worldview is very closely related to the definitions of culture. A worldview consists of the principles we acquire to make sense of the world around us, to generate behavior, and interpret our experiences and knowledge. Young people learn these principles, including values, traditions, and customs from stories, family, community, and examples set by community leaders.

Shoshone and Bannock peoples have traditionally tried to live in harmony with the world around them. This has required the construction of an intricate subsistence-based worldview, a complex way of life with specific cultural mandates regarding the ways in which the human being is to relate to other human relatives and the natural and spiritual worlds. This worldview, as demonstrated historically by the Shoshone and Bannock peoples, contained a highly developed social consciousness and sense of responsibility toward all beings or species. The stories, rituals and ceremonies are consistent with their relationship to one another and to their environment.

Tribal people hold as self-evident that the universe (nature) is a living thing. According to the Shoshone and Bannock, the universe is considered a fabric; everything is connected or interwoven to everything else and everything is alive and responsible to its relationships in every way. Life is cyclical, and therefore requires certain ways of caring in order to maintain the cycle. Therefore, we cannot put ourselves above other living things because we were all created by the Creator, and all are considered an essential component of the universe. Because everything is considered alive and because we have responsibilities to all living things, we cannot force the rest of nature to do what we want.

All things of all sizes and scales in nature are dependent on one another. Everything, though having its own individuality and special place, is dependent on and shares in the growth and work of everything else. The reverse is also true. Together with the knowledge that everything in the universe is dependent upon everything else comes a respect. Since all beings are related, human beings must be constantly aware of how our actions will affect other beings, whether they are plants, animals, humans, waters, etc. Through this interdependency and awareness of relationships, the universe is balanced. Too much of one thing or a disturbance in the interdependence of living things can lead to an imbalance.

The essence of the Shoshone and Bannock attitude toward peoples, lands and other life forms is one of kinship relations in which no element of life can go unattached from human life or society. The responsibility of the humans is to perform responsible tasks with respect for each form of life that we encounter, learning from them the basic structure of the universe and life's lessons, and ensuring that they receive in return the respect and dignity accorded them. This acknowledgement of the dignity of other life forms, which is simple but profound recognition, underlies all attitudes toward the organic world, seen and unseen. The human species is allowed to use plants and animals for food and medicinal purposes but in return we must ensure that their sacrifice becomes a means of fulfillment.

When we speak of Shoshone and Bannock worldview, we do not speak of an abstraction, a set of beliefs; rather, we describe a revelation/realization (attitude) toward the world which derives out of many experiences and cumulative observations. Thus, attitude is as important as action: therefore one is to be careful in thought and action so as not to injure another's mind or offend the spirit of the animals and surrounding environment. Indeed, for one to have a powerful mind is to be aware of or awake to its surroundings. Shoshone and Bannock peoples continue to see life as reality here and now, consequently their responsibilities are with respect to all forms of life.

Shoshone and Bannock histories and experiences are land-centered/mediated. This means every feature of a landscape has stories attached to it. These stories relate both secular events such as hunting and warfare and sacred events such as tribal or personal religious experiences. Existence in this world is also a spiritual pilgrimage, and the landscape itself is spiritual. Tribal people pass down this historical and spiritual perspective of places to the next generation to preserve the stories and to help identify the special aspect of the places.

The Shoshone and Bannock people have been born to a particular spiritual landscape and one travels through life as through the landscape of spiritual, mental and physical essence. Tribal people have a real attachment to the land and critical to this attachment is the family and the community as functioning parts of the landscape. The primary dimension of this attachment is that we are part and parcel of it physically. Our physical contribution makes sense only because our memory of land is a memory of ourselves, our deeds and experiences. And, even though the Shoshone and Bannock Tribal people may not be able to live specifically on the INEEL landscape because of historical removal from the area, the attachment, experiences, stories and knowledge of the area are still preserved, practiced, and alive.

The Tribal concept of "healthiness" -- healing powers of the landscape and the interdependency of all things in the universe, are two aspects of the holistic way of life. Shoshone and Bannock peoples health is closely tied to the physical, mental and spiritual well being of all other components of the universe, and consequently changes, disturbances and voids in the native landscape ecology create a state of physiological illness. Based upon these Tribal worldviews, the Risk Committee assessed and analyzed the "healthiness" of the INEEL landscape and more specifically the release sites in WAG-10.

IV. Tribal Culture-Based Risk-Related Comments and Questions

A. Water and Air

According to the Shoshone-Bannock peoples the world is made up of four elements, earth, water, air and light (fire, heat). Everything maintains its shape by a balance of these elements in their being (structure). The order of these elements in each animal, plant and other life is different. We are told about the sacredness of our land which is our body, and the values of our culture which is our soul, but most importantly, water is the blood of mother earth and the Tribes. And, if its life giving flow is stopped, or it is polluted, all else will die, and the many years of our existence will come to an end. Simply stated, water is life and considered sacred.

The record and site visits by the Tribal Risk Committee provided general information about the contaminants of the specific WAG-10 areas, but from the Tribal perspective the INEEL and the region influence must be viewed as a whole. Based upon the Tribal worldviews, everything is interdependent upon each other, and therefore, any contamination cannot be isolated in one area such as WAG-1 or WAG-10. The contamination of one waste area group has created an imbalance in nature that impacts all beings -- plants, animals, water, birds, and the air, not simply WAG-10 or WAG-6. The Work Plan needs to view the contamination and cleanup as a whole.

Based on the critical role water plays in Tribal culture, the elders during a site visit asked what contaminants have been injected into the groundwater at the INEEL. The immediate response of WAG-10 was that the groundwater impacted was not in the WAG-10 area. This WAG-10 response and view is too limited and isolated. The Tribal inquiry goes to the importance of water at the INEEL as a whole and again represents the Tribal perspective of risk if **any** water at INEEL has been contaminated.

To date the inventory of such contaminants and radionuclides, the associated disposal history, the operational works related to the injection and other pertinent information have not been made available

for the Tribes for critical evaluation. The provided OU 10-04 Work Plan does not contain such information which should be an essential part of the responsibility of WAG-10 which includes the Snake River Plain Aquifer within and beyond the INEEL boundary.

A second inquiry relating to water was where are the monitoring wells located off-INEEL. And, are any wells located near Fort Hall Indian Reservation? The Shoshone and Bannock peoples' aboriginal lands include lands off the present-day Fort Hall Indian Reservation but the Treaty of 1868 also reserves a permanent home for the peoples on Reservation. The concern of contamination of water is threefold, to protect the off-reservation aboriginal lands and its uses, to protect the Treaty reserved land, and to protect the religious use of water in the area impacted by the Snake River aquifer. Tribal knowledge and experience shows that the flow of water from INEEL does reach the Fort Hall Indian Reservation Bottoms areas. The Bottoms area is a significant and pristine area of the Reservation that continues to be utilized for religious and cultural purposes by Tribal members and therefore must be protected.

The conclusions made by INEEL that the groundwater underneath and from INEEL does not flow toward the Reservation is inconsistent with and contradictory to the conclusions reached by the USGS as documented in their Professional Paper 1408-F (1992). In addition, the USGS Reports 88-4165 (1988) and 90-4090 provide information on long-lived radionuclides in INEEL groundwater, which, if not properly addressed, will potentially become part of the hazardous exposure scenarios to the Tribes in the future. Figures 23, 26, and 27 and text explaining these figures are of relevance to this discussion. Figure 23 shows at least four hydrogeologic layers in the Snake River Plain aquifer and Figure 26 shows measured water-table contour of March 1980. The figure indicates that Northeast of American Falls Reservoir the regional groundwater flow direction is toward the southeast, or toward the Fort Hall Indian Reservation. Figure 27 of the simulated head differences between layers 1 and 2 indicates further that in the northeast of the American Falls Reservoir the groundwater flow is upward from layer 2 to layer 1 (the head of the former is five feet higher than the latter). The Summary and Conclusions of the USGA 1408-F report state that "more and better data and continued model development and testing are needed to further improved understanding of the hydrologic system in the eastern Snake River Plain. . . [t]o better define stream-aquifer relations, data are needed on streambed hydraulic conductivities." The general statements of WAG-10 in the Work Plan about the groundwater flow toward Twin Falls are not supported by the USGS investigation in both the local and regional hydrogeologic conditions at and near the Fort Hall Indian Reservation.

The final inquiry with regard to water was what type of contaminants have been detected in the wells off-INEEL? This concern has not been adequately addressed by the INEEL staff, and information pertinent to the off-site hydrogeologic monitoring system involved in the RI/FS Work Plan of WAG-10 has not been provided to the Tribes for critical review and evaluation.

B. Birds and Animals

The standard of truth in the Shoshone and Bannock knowledge systems is direct personal experience. Each generation of Tribal people makes observations, compares their personal experiences with what they have been told and exchanges their findings with other present day Tribal members. Thus, Tribal people are suspicious of second-hand claims (which form the bulk of Western scholars' knowledge), but at the same time they are reluctant to challenge the validity of anyone's own observations.

Tribal people hold strong beliefs in the healing powers of plants and animals or parts of them; in their ability to provide people with strength, both physical and spiritual; and in their ability to be in tune with the universe. The Tribal culture and biodiversity of plants, and animals are intimately related

because nature is composed of everything: plants, animals and human beings. We are all related according to Shoshone and Bannock peoples.

Accordingly, if one element of nature is removed the universe is no longer in equilibrium. Nature can be destroyed because all the elements are the complements of nature. Also, when new human-made elements such as chemicals are introduced, the balance of nature may be disrupted and we begin to lose the species that exist. We need all species because they help us in our lives and they are an essential part of the circle of life that connects all living things. In short, everything in the circle of life has a purpose.

Numerous chemicals have been introduced and contaminated the WAG-10 areas, and thus have created a void in the circle of life. The absence of animals, birds and certain plant species indicates the area is out of balance. There must be corrective action taken to restore the balance in the universe.

On the site visits to WAG-10, the Tribal Risk Committee was interested in what types of birds reside at the INEEL. The Tribal Risk Committee, having viewed photos of animals and birds also inquired as to how old were the pictures of birds in the ERB building. The WAG-10 provided bird surveys conducted by the Environmental Science Foundation that identifies many bird and animal species, but only a few species and signs of species were directly observed by Tribal members on the site visits. The Tribal Risk Committee members possess historical and personal knowledge of many animals and birds at the WAG-10 areas, but the recent field trips did not confirm or reinforce their earlier observations. The failure to observe species raised doubts in the minds of the observers as to the existence of animal and bird species on the INEEL.

Additionally, during the site visits by Tribal Risk Committee members, expressed concerns in regard to the significance of all ecological species at the INEEL site in support of the Tribal traditional way of life and subsistence diets, among others. The presently contaminated native landscape ecology has not been adequately understood and monitored by the current INEEL ERA RI/FS approach. In particular, the present conditions of the Snake River Plain Aquifer under the historical practice of waste disposals by well injections, burials and pond discharges, as well as the atmospheric resuspension/deposition of long-lived radionuclides and persistent contaminants released by operation of site facilities have not been carefully monitored and studied with respect to the possible and subsequent cumulative contamination of the Reservation and its Peoples.

Consequently, the relationships between the indigenous animals, their regional habitats and the tribal ways of life, i.e. the key components of the "health/integrity of the native biosphere", require a more carefully designed monitoring and management system which addresses not only the proposed ERA objectives at the INEEL site, but also the possibilities of contaminants being transported to the Fort Hall Reservation by means of species migration, long-range air and aquatic transport pathways, and all aboriginal exposure scenarios related to the Tribal culture.

In this sense, the exposed individual physiological responses of the Tribal members and their predisposition to radionuclides and contaminants emitted by the INEEL sources must also be considered via traditional life-ways as an indispensable and integral part of the comprehensive RI/FS work plan and the OU 10-04 RI/FS ERA process currently proposed by INEEL. Unless and until specific institutional commitments and provisions to make such monitoring information available to the Tribes for review and evaluation in the near future, it may be impossible for the Tribes to contribute meaningful input to establish a balanced culture-based risk assessment and management process at the INEEL site, and to fully protect and restore their cultural resources and environmental health/wellness for all generations to come.

In addition to not observing any birds, the Tribal Risk Committee asked what other animals reside on the INEEL. The elders did not see any indigenous species on the INEEL during their recent site visits. In the RI/FS Work Plan, Appendix D, OU 10-04 Ecological Risk assessment and Methodology, this question has not adequately been addressed. And Table D1-1.2 and Figures D1-2-1 and D1-2-2 do not provide any explanations or clarifications regarding the existing endemic species. Tables D1-2-1, -2, -3 and -4 have not contained any specific evidence that the proposed species for exposure pathway analysis and receptor identification actually exist and that their investigation adequately addresses the ecological consequences of the presently proposed RI/FS work plan, ongoing or historical operational activities at INEEL.

The Tribal Risk Committee also asked where are areas on the INEEL that have the native plant life because no native plants were observed on the visits, except in the northern section of INEEL where junipers were growing. Moreover, some plants that were observed did not seem healthy, meaning that the plants were smaller and appeared stressed. Information pertinent to this Tribal concern has not been addressed or included in the OU 10-04 Comprehensive RI/FS Work Plan. INEEL staff also acknowledged the existence of foreign and replacement species at INEEL, but the Work Plan has not discussed the potential dominance risk of non-native species over the native one, and their related possible ecological threats to the local and regional indigenous foodweb, and consequently the traditional subsistence and spiritual ecosystem.

Finally, the Risk Committee questioned what are the potential impacts of INEEL contaminants on the indigenous species. Even though a list of publications from the Environmental Science and Research Foundation has been provided to the Tribal Risk Committee in this regard, none of the ESRF works to date has investigated the transgenerational and genetic effects of the long-lived properties, bioaccumulation, bioreaction and persistence of the contaminants and radionuclides identified and listed in Tables D1-1-3 and -5 of Appendix D1, Attachment 1. Furthermore, the information relevant to the contaminants and radionuclides of concern does not include data on their ranges of measured concentrations found in the various environmental media and locations at INEEL in the last decade, and the changing nature of their existence in the listed exposure pathways of Figures D1-2-1, -2 and -3, especially those associated with the aquatic foodweb for WAG industrial waste and sewage treatment ponds, among others.

C. Biological Field Surveys

The Tribal Risk Committee has the following concerns on biological field survey methods.

Section D1-5-2 of Appendix D has provided a sketch of field survey works conducted in 1996 and 1997. However, there appears to be little connection between these two sets of survey data, and how the findings from one survey is to be integrated with the other. Because the objectives of the 1996 survey data were for areas surrounding WAG facilities, and those of the 1997 were for the individual sites of concern within WAG facilities, the description of how the data/findings have been combined to develop the currently proposed scope of biological field survey should be provided to the Tribes for assessment of its adequacy with respect to cultural objectives.

Compilation and Tribal review of existing data on ecological risk assessment for the RI/FS work plan. Section C2-4 of the work plan has discussed the present ORACLE database employed by the INEEL environmental works and its compatibility with the GIS technology for interpretation. Furthermore, existing data sets, including INEEL BBS and wildlife distribution information, have also been incorporated into that database with the GIS vegetation, soil, and habitat data to form a comprehensive ecological information system, capable of overlaying different thematic maps such as those of contaminant concentrations and spatial extent for RI/FS investigation. To date, the Tribes have

not received accessibility and opportunity to peruse these databases and information systems essential to the critical review and evaluation of the work plan.

Subjective judgment of biological survey new data: Section C2-2.1 discussed the list of site habitat attributes for use in the assessment of their suitability for each species, e.g., size, substrate (gravel, asphalt, lawn, etc.), natural or manmade features that may entice wildlife (water, light, etc.), proximity to areas or sites of facility activity, presence and availability of food or prey, availability of nesting, roosting, or loafing habitat, signs of wildlife use, and prior history and known sightings or use. These attributes “were subjectively rated (high, medium, low, none ratings were the scoring scale) for positive contribution to overall habitat suitability”. The Tribes consider the interaction and interdependence of all species as an important requirement for the viability of any habitat. It is not clear to the Tribes how our concerns and considerations are to be incorporated into the present INEEL framework of biological and ecological investigation, and over what appropriate time-scale of survey records for the resulting reliable assessment.

Appendix C2, Attachment 1. The ecological risk assessment results presented therein for the extent and nature of individual sites of contamination, contaminant of potential concern (COPCs), low likelihood of risk, and related data gaps cannot be considered as adequate using hazard quotients (HQs) estimates and toxic reference values (TRVs) because these parameters do not and cannot address the transgenerational, synergetic and bioaccumulative effects of the COPCs. These parameters also fail to take into account the holistic interdependence among the affected species.

Relationship between the INEEL Comprehensive Facility and Land Use Plan (December 1997) and the present Comprehensive RI/FS Work Plan for WAGs 6 and 10: Preliminary review of the Land Use Plan for the 25-year, 50-year, 75-year, and 100-year scenarios has not found any clear linkages between the proposed clean-up of INEEL contaminated sites and related activities with the minimum requirements of health, safety and environmental restoration with respect to the long-term objectives and the rights of the Tribes to access and preserve their traditional cultural resources. The lack of basic information for critical review and evaluation of the site activities in both documents have precluded any meaningful participation of the Tribes in matter that significantly and directly affecting their cultural interests and treaty rights.

V. Technical Critical Review and Evaluation Statements for the RI/FS Work Plan.

Appendix D of the WAG-6 and 10 Workplan for the OU 10-04 Comprehensive RI/FS contains the INEEL ERA Approach and Methodology in support of the currently under review four-phased approach. Appendix D1 provides a concise outline and summary of such approach, including the outline of the ERA activities corresponding to the 1997 USEPA 8-step process under Superfund, without any explicit plan for Step 8 of Risk Management. In the well accepted integrated risk assessment approach, risk management goals cannot be considered separately and independently from the initial conceptualization of the ERA process (see for example the USEPA Guidelines for ERA of May 14, 1998), unless supporting explanation and clarification as to the reasons for the absence of Risk Management considerations, cf. Risk Assessment objectives and investigative phases, from the overall ERA framework are provided and understood by all affected parties.

From the information provided in this Appendix, it appears that WAGs 1 to 9 correspond to INEEL operational facilities, while WAG 10 encompasses concerns associated with the Snake River Plain Aquifer and those surface and subsurface areas not included in the bounds of the facility-specific WAGs. However, Sections D1-2.3.1.2 and 2.3.1.3 stated that evaluation of INEEL aquatic receptors was limited to those associated with WAG facility sewage disposal and industrial waste ponds, and no pathway from ground water to ecological receptors exists on INEEL, and therefore, ground water will not be

quantitatively evaluated in the OU 10-04 ERA. It is clear that these assumptions are indefensible from a scientific point of view; and that because the WAG divisions are not based on scientific considerations, they cannot justify nor support the comprehensive objectives of ecological contamination monitoring and evaluation at INEEL as presently proposed in the Workplan and inconsistent with existing USEPA ERA guidelines.

The INEEL internal screening procedures appear to be contained (and cited) in the report "Draft Guidance Manual for Conducting Screening Level Ecological Risk Assessment at the INEL", by R.L. VanHorn, N.L. Hampton, and R.C. Morris (April 1995), EG&G, Idaho Falls, ID, INEL-95/0190. However it has not been made available to the Tribal Risk Committee for review and evaluation as requested at the meeting of February 23, 2000.

The Tribal Committee is continuing to review the INEL historical dose evaluation reports that were provided in response to the Tribal Risk Committee's inquiry on past studies of atmospheric transport and dispersion of radioactive and hazardous materials emitted from the INEEL site. The preliminary review shows that as stated in DOE/ID-12119, Vol. 1, August 1991, page 12, that "The largest amount of radioactivity released from the INEL over the period of one year occurred in 1961 when 1,500,000 Ci were released." On page 11, the report states that "Data from 1952 and 1961 do not identify the specific mixture of radionuclides released." Because there is no air dispersion and dose reconstruction for 1961, (see Table 4-1, page 30) for the Fort Hall Indian Reservation under specific critical weather conditions, such as inversions and high humidity under NW toward SE winds, the lack of information and uncertainty associated with this radioactivity emissions situation causes justifiable concerns for the air dose impacts on the Fort Hall Indian Reservation and its people.

The WAG-10 institutional considerations for the Tribal comments have been expressed only verbally at several organizational meetings, but there is no formal recognition of the role of Tribal participation in the ERA process. It is highly recommended that these institutional promises be formalized and agreed to, prior to any Tribal transmission of information or comments pertinent to their cultural resources, in the engagement and communication protocol. The Tribes do not have any signed agreement or protocol with the WAG-10 regarding confidentiality of restricted, proprietary Tribal information. Therefore, the Tribal information provided and contained in this Report has been drafted in a general information manner.

VI. Other Topics of Tribal Concern

The Shoshone and Bannock Tribal Risk Committee has other concerns that were not addressed in the Work Plan. These include:

- A. The exposure, damages or potential damages of cultural resources by air borne contaminants have not been presented in the Work Plan.
- B. Off site air quality monitoring information in the area of the Fort Hall Indian Reservation has not been presented in the Work Plan to confirm the non-existence of air pollution caused by INEEL activities.
- C. No cultural biomarker sampling has been included in the ecological risk assessment for the WAG-10 sites.
- D. No baseline monitoring and change monitoring associated with Tribal cultural resources has been considered in the Work Plan.

- E. Aspects of human and ecological data relevant to cultural biomarkers and baseline monitoring should be considered as part of the Work Plan.
- F. No consideration for future Tribal land uses at the WAG-10 sites have been addressed by the Work Plan.
- G. The requirement for Tribal culture education, promotion, prevention, and preservation plans have not been addressed by the Work Plan as related to the proposed RI/FS activities.

